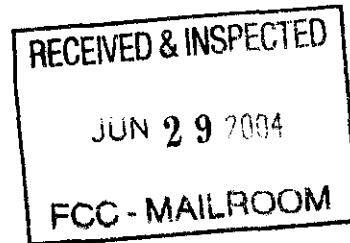


WestCarolinaTel
YOUR COMMUNICATIONS
COOPERATIVE



June 14, 2004

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20544

Re: In the Matter of The Pay Telephone Reclassification and Compensation
Provisions of the Telecommunications Act of 1996, CC Docket 96-128

Dear Ms. Dortch:

West Carolina Rural Telephone Cooperative, Inc. ("WCTEL") submits this letter and accompanying certification as record that WCTEL is not a "Completing Carrier" as that term is defined in the Commission's Order in CC Docket 96-128 ("Order")¹, released on October 3, 2003.

As West Carolina is not a Completing Carrier nor does it handle the types of calls the Commission has specified as being subject to both compensation and reporting to Payphone Service Providers, West Carolina is not subject to such requirements at this time. If WCTEL's operations are altered to the extent that WCTEL necessarily becomes a Completing Carrier, West Carolina will fully comply with the Commission's rules pertaining to this and all other payphone compensation and reporting matters.

Sincerely,

David J. Herron
General Manager
West Carolina Rural Telephone Cooperative, Inc.

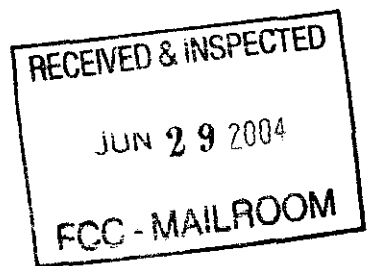
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¹ The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).

WEST CAROLINA RURAL TELEPHONE COOPERATIVE, INC.

P.O. Box 610 • 229 Highway 28 By Pass • Abbeville, South Carolina 29620

TEL. 864-446-2111 • FAX 864-446-2144

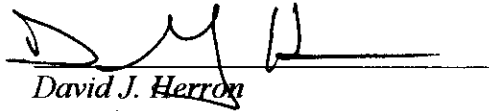


**PAY TELEPHONE COMPLETING CARRIER CERTIFICATION
OF *WEST CAROLINA COMMUNICATIONS, LLC***

1. My name is *David J. Herron*. I currently serve as the *President of West Carolina Communications, LLC (WCC)*, a provider of interstate interexchange telecommunications services as a toll reseller in the state of *South Carolina*. In this capacity, I have become familiar with the network operations of *WCC* and its practices associated with the completion of calls originated from Pay Telephones.
2. WCC is not a Completing Carrier as defined by Commission in 47 CFR § 64.1300.
3. With respect to coinless calls, WCC is a switchless reseller. WCC contracts with SC-Net dba Spirit Telecom for completion of coinless calls.
4. With respect to subscriber toll-free payphone calls, WCC is a switchless reseller. WCC contracts with SC-Net dba Spirit Telecom for completion subscriber toll-free calls.
5. WCC does not perform call validation or processing functions for either access code calls or subscriber toll-free payphone calls.
6. WCC does not create call detail records for either access code calls or subscriber toll-free payphone calls. WCC's action with respect to call detail records is limited to rating and billing.
7. WCC compensates SC-Net dba Spirit Telecom for the wholesale cost of the subscriber toll-free calls.
8. WCC has confirmed with Spirit Telecom that any calls purchased by WCC are included in the respective call tracking systems and compensation remittance process of SC-Net dba Spirit Telecom.
9. In consideration of the aforementioned facts, WCC is not subject to the compensation or reporting requirements related to the Commission's Report and Order¹ and associated revisions to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

¹ *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996*, CC Docket No. 96-128, Report and Order, (2003) (Order).

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on *June 15, 2004*.

A handwritten signature in black ink, appearing to read "David J. Heron", is written over a horizontal line.

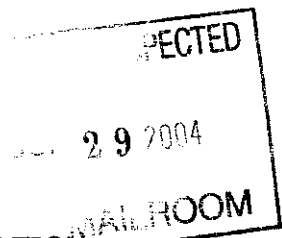
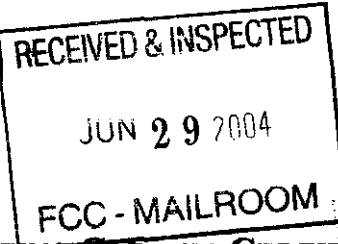
President

West Carolina Communications, LLC

229 Hwy 28 Bypass

PO Box 610

Abbeville, SC 29620

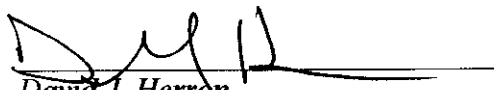


**PAY TELEPHONE COMPLETING CARRIER CERTIFICATION
OF *WEST CAROLINA RURAL TELEPHONE COOPERATIVE, INC.***

1. My name is *David J. Herron*. I currently serve as the *General Manager* of *West Carolina Rural Telephone Cooperative, Inc. (WCTEL)*, a provider of local exchange telecommunications services as an Independent Local Exchange Carrier in the state of *South Carolina*. In this capacity, I have become familiar with the network operations of *WCTEL* and its practices associated with the completion of calls originated from Pay Telephones.
2. WCTEL is not a Completing Carrier as defined by Commission in 47 CFR § 64.1300.
3. WCTEL's provision of operator services for the completion of local calls from pay telephones is handled by Rock Hill Telephone Company dba Comporium Communications through a contractual arrangement.
4. WCTEL has confirmed with Rock Hill Telephone Company dba Comporium Communications that any calls processed by Comporium Communications are included in the respective call tracking systems and compensation remittance process of Comporium Communications.
5. WCTEL does not currently provide a coinless service.
6. WCTEL does not currently provide a subscriber toll-free service.
7. In consideration of the aforementioned facts, WCTEL is not subject to the compensation or reporting requirements related to the Commission's Report and Order¹ and associated revisions to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

¹ *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).*

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on *June 15, 2004*.

A handwritten signature in black ink, appearing to read 'D. J. Herron', is written over a horizontal line.

David J. Herron

General Manager

West Carolina Rural Telephone Cooperative, Inc.

229 Hwy 28 Bypass

PO Box 610

Abbeville, SC 29620